

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

DR. LAMAR COLLINS AND	§	
ROSE COLLINS,	§	
Plaintiffs,	§	
	§	
v.	§	
	§	CIVIL ACTION NO. 6:21-cv-657
ROBINSON INDEPENDENT SCHOOL	§	
DISTRICT,	§	
Defendant.	§	

APPENDIX TO NOTICE OF REMOVAL

Ex. A. Documents in State Court file, Cause No. 2021-1636-5; *Dr. Lamar Collins and Rose Collins v. Robinson Independent School District*; In the 414th Judicial District Court, McLennan County, Texas

EXHIBIT A

DOCUMENTS IN STATE COURT FILE

1. Docket Sheet
2. Request for Issuance of Summons to Dr. Michael Hope, Superintendent of Robinson Independent School District
3. Plaintiff's [sic] Original Petition and Jury Demand
4. Filing receipt for Original Petition
5. Filing receipt for Request for Issuance of Citation
6. Citation and Return of Service
7. Request for certified copies
8. Filing receipt for certified copy request

MCLENNAN DISTRICT CLERK

501 Washington Avenue , Suite300 Annex

Waco , TX , 76701

PHONE # : (254) 757-5057

FAX : N/A

DOCKET SHEET - CIVIL CASE**DOCKET NO. :** 2021-1636-5**CASE STATUS:** PENDINC **FILED DATE :** 06/03/2021**TJC CODE :** ALL OTHER C**STYLE :** DR. LAMAR COLLINS, ET AL Vs ROBINSON ISD**DISPOSITION :****DISPOSED :** N/A**TJC CODE :**

TYPE	PARTY	ATTORNEY
PLAINTIFF	ROSE COLLINS	
	0	0
PLAINTIFF	DR. LAMAR COLLINS	
	0	0
DEFENDAN	ROBINSON ISD	
	0	0

HEARING NOTES : 2021-1636-5

DATE	TEXT
06/03/2021	E-FILE INFORMATION SHEET
06/03/2021	PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND
06/03/2021	REQUEST FOR ISSUANCE
06/03/2021	E-FILE INFORMATION SHEET
06/04/2021	CITATION ISSUED TO ROBINSON ISD
06/15/2021	LETTER REQUEST FOR CERTIFIED COPIES
06/16/2021	E-FILE INFORMATION SHEET

CERTIFIED DOCUMENT
PAGE 1 OF 2
DISTRICT CLERK OF
McLENNAN COUNTY, TEXAS

MCLENNAN DISTRICT CLERK

501 Washington Avenue, Suite 300 Annex

Waco, TX, 76701

PHONE #: (254) 757-5057

FAX: N/A

DOCKET SHEET - CIVIL CASE

CASE NO. : 2021-1636-5

STYLE : DR. LAMAR COLLINS, ET AL Vs ROBINSON

DOCKET ENTRY

CERTIFIED DOCUMENT
PAGE 2 OF 2
DISTRICT CLERK OF
McLENNAN COUNTY, TEXAS

The State of Texas
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County
Texas do hereby certify that the foregoing is a true and correct
copy of the original as the same appears on file in the District
Court, McLennan County, Texas witness my official hand and seal of
office this 24th day of June
A.D. 2021

Jon R. Gimble
McLennan County, Texas
By [Signature]
Deputy

RECEIVED

JUN 23 2021

WG - Austin



McLENNAN COUNTY
6/3/2021 4:25 PM
JON R. GIMBLE
DISTRICT CLERK

Paige Edmundson

JON R. GIMBLE DISTRICT CLERK

McLENNAN COUNTY COURTHOUSE
501 Washington Ave., Suite 300 Annex
WACO, TEXAS 76701
254-757-5057 OR 757-5054

REQUEST FOR ISSUANCE

CAUSE NUMBER: 2021-1636-5 DATE: 6-3-2021

PERSON TO BE SERVED: Dr. Michael Hope
500 W. Lyndale, Robinson, TX 76706

ADDRESS TO SERVE: _____

FEES PAID BY: CHECK ☐ CASH ☐ DEBIT ☐ OATH ☐ CREDIT CARD (INCLUDES PROCESSING FEE) ☒

ISSUANCE:

CITATION ☒ NOTICE OF HEARING/CONTEMPT _____

TRO ☐ PROTECTIVE ORDER ☐

WRIT OF (SPECIFY) ☐ OTHER (SPECIFY) _____

SERVICE:

DELIVER TO ATTORNEY Colin@wileywalsh.com

DELIVER TO CONSTABLE _____

DELIVER TO PRIVATE PROCESS SERVER (SPECIFY) _____

DELIVER TO SHERIFF _____

REQUESTED BY: (PLEASE PRINT)

BY Colin Walsh

FIRM Wiley Walsh, P.C.

CONTACT NO. 214-738-0883

The State of Texas
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County Texas do hereby certify that the foregoing is a true and correct copy of the original as the same appears on file in the District Court, McLennan County, Texas witness my official hand and seal of office this the 3rd day of June A.D. 2021

Jon R. Gimble
McLennan County, Texas
By Paige Edmundson
Deputy

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PAGE 5 OF 23
DISTRICT CLERK OF
McLENNAN COUNTY, TEXAS

FILED
MCCLENNAN COUNTY
6/3/2021 2:50 PM
JON R. GIMBLE
DISTRICT CLERK
Paige Edmundson

CAUSE NO. 2021-1636-5

DR. LAMAR COLLINS AND
ROSE COLLINS,

Plaintiffs,

-v-

ROBINSON INDEPENDENT SCHOOL
DISTRICT,

Defendant.

§
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§
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§

IN THE DISTRICT COURT

414TH JUDICIAL DISTRICT

MCCLENNAN COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND

TO THE HONORABLE DISTRICT COURT JUDGE:

Plaintiffs Dr. Lamar Collins and Ms. Rose Collins were two of only four African Americans who worked at Robinson High School. Dr. Collins was the principal, and his wife was a substitute teacher. They were both well-liked by students and parents. Unfortunately, when Dr. Collins' white secretary complained about Ms. Collins to the white superintendent and white deputy superintendent, RISD reacted with bigotry, racism, and discrimination.

First, without explanation, RISD banned Ms. Collins from the high school campus. Then a month later, again without explanation, RISD banned Ms. Collins from all campuses.

RISD then went after Dr. Collins. In June, Dr. Collins was told, without explanation, that his contract would not be renewed. Dr. Collins was told to quit or be reassigned. When Dr. Collins refused to quit, he was reassigned. RISD then cut his pay by nearly \$20,000.

No explanation has ever been given for RISD's actions. RISD has broken the law.

CERTIFIED DOCUMENT
PAGE 1 OF 9
DISTRICT CLERK OF
MCCLENNAN COUNTY, TEXAS

I.
DISCOVERY CONTROL PLAN

1. Plaintiffs intend that this suit be governed by discovery control level two.
2. Plaintiffs affirmatively plead that this suit is not governed by the expedited actions process in Texas Rule of Civil Procedure 169 because Plaintiffs seek relief over \$250,000 but not more than \$1,000,000.
3. The party seeks monetary relief over \$250,000 but not more than \$1,000,000.

II.
PARTIES

4. Dr. Lamar Collins and his wife Rose Collins are individuals who reside in California. However, at all times relevant to this lawsuit they resided in McClennan County, Texas.
5. Robinson Independent School District is a local governmental unit or municipality located within McClennan County, Texas. RISD can be served through its superintendent, Dr. Michael Hope, at 500 W. Lyndale, Robinson, TX 76706.

III.
JURISDICTION & VENUE

6. Jurisdiction is appropriate because Defendant is a Texas public school district and subject to both the Texas Labor Code and 42 U.S.C. § 1981.
7. Sovereign immunity to the extent it exists is waived under Texas Labor Code § 21.002(8), 42 U.S.C. § 1981(c), 42 U.S.C. § 2000d-7, and 42 U.S.C. § 1983.
8. Venue is appropriate because the acts giving rise to this suit occurred in McClennan County, Texas.
9. The damages sought are within the jurisdictional limits of the court.

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PAGE 2 OF 8
DISTRICT CLERK OF
McLENNAN COUNTY, TEXAS

IV.
FACTS

10. Dr. Collins and his wife first started working for Robinson ISD in Fall 2018.

11. Dr. Collins was hired as the principal for Robinson High School.

12. Rose Collins worked as a substitute teacher at the same school. Both Dr. and Ms. Collins are African American.

13. At the time of their employment, there were only two other African Americans employed by that high school.

14. Unfortunately, the Collins were subjected to race discrimination and retaliation.

15. Dr. Collins' secretary was named Ravon Morgan, who is white. She did not like Ms. Collins and was often rude and disrespectful to her.

16. On May 22, 2019, Dr. Collins decided to address the tension between Ms. Morgan and Ms. Collins. He called them in to have a meeting in his office.

17. When Dr. Collins asked Ms. Morgan what the issue between them was, Ms. Morgan said she did not have a problem with Ms. Collins. It was simply that she did not have time to socialize with substitute teachers.

18. Dr. Collins then asked Ms. Collins what the problem was. Ms. Collins said that Ms. Morgan often looked Ms. Collins in the eye and did not speak. When Dr. Collins asked for an example, Ms. Collins said that on one occasion, when she was in Dr. Collins' office, Ms. Morgan came in, looked at some papers on the desk and was about to walk out when Ms. Collins said, "Are you still not going to speak?"

19. At this point during the meeting, Ms. Morgan interjected that she did speak to Ms. Collins. Ms. Collins then very sternly said, "That's a bold-faced lie. You are so disrespectful."

20. Ms. Morgan then stated that she was going to leave and did so.

21. According to the statements submitted to Tim Van Cleave, the Deputy Superintendent, Ms. Collins never interrupted Ms. Morgan, did not use profanity, and did not yell at Ms. Morgan.

22. After Ms. Morgan left, she filed a complaint with Mr. Van Cleave, who is also white. Mr. Van Cleave then immediately called Dr. Collins into his office. The superintendent, Dr. Michael Hope, white, was also there.

23. Mr. Van Cleave asked Dr. Collins what happened. After Dr. Collins replied, Mr. Van Cleave, without any further investigation or even asking Ms. Collins what had happened, told Dr. Collins that his wife was prohibited from substitute teaching and banned from the high school for the rest of the year.

24. Allegedly, an investigation was then conducted into Ms. Collins' behavior. However, to date, the results of that investigation have never been revealed to Dr. Collins, Ms. Collins, or even the Equal Employment Opportunity Commission.

25. On June 13, 2019, an indefinite, physical ban from all RISD campuses was imposed against Ms. Collins through a letter. No explanation was given in the letter nor during an in-person meeting scheduled five days later.

26. On June 18, 2019, during that meeting Dr. Collins asked for the reasons behind his wife's district-wide ban. Instead of answering his question, he was told that his contract as principal would be non-renewed. Again, no reason was given. And to date, no reason has been given.

27. On June 25, Dr. Hope told Dr. Collins that if he did not resign, he would be reassigned to a different position. No explanation was provided.

28. When Dr. Collins did not resign, Dr. Hope reassigned him to a position that paid \$20,000 less a year.

29. In July, Dr. Collins realized he could not support his family with the significant pay cut and he was forced to resign as a result.

30. To this day, Dr. Collins has never been given a reason for this turn of events. Further, after his forced resignation he was replaced by a white employee.

31. The only explanation seems to be race discrimination and retaliation.

32. The racist tropes that led to Dr. Collins and Ms. Collins being forced out of RISD are plain, obvious, and sickening. For example, Ms. Collins was presumably banned from the high school and all campuses because of her behavior during the meeting with Dr. Collins and Ms. Morgan. There were only three people in that meeting. Two of those present in the meeting said that no inappropriate conduct occurred. Only one person, a white woman, presumably said otherwise. Therefore, if Ms. Collins was banned from RISD based on that event, it was because white men believed a white woman over the statements of two African Americans.

33. Moreover, Mr. Van Cleave engaged in abhorrent racial stereotyping during the investigation when he, among other things, asked Ms. Collins whether her husband, Dr. Collins, was sleeping with his secretary.

34. RISD's actions violate the Texas Labor Code.

V.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

35. Plaintiffs filed a Charge of Discrimination that was dual filed with the Texas Workforce Commission's Civil Rights Division on or about December 18, 2019.

36. Plaintiffs became entitled to a Right to Sue from the Texas Workforce Commission on June 15, 2020.

37. Plaintiffs perfected their charges with the Texas Workforce Commission on June 2, 2021.

38. All conditions precedent to the bringing of this suit have been satisfied or have been fulfilled.

VI.
RACE DISCRIMINATION BY DEFENDANT IN VIOLATION
OF THE TEXAS LABOR CODE

39. Plaintiffs re-allege and incorporate the allegations stated in the Paragraphs above as if fully set forth herein.

40. Defendant's actions, including but not limited to its termination of Ms. Collins, its demotion of Dr. Collins, and the forced resignation of Dr. Collins, all of which led to lost wages, were undertaken because of Plaintiffs' race.

41. Plaintiffs were replaced by or treated less favorably than workers who were not African American.

42. Defendant violated Texas Labor Code when it took adverse action against Plaintiffs because of their race.

43. Defendant's unlawful discrimination in violation of the Texas Labor Code has caused Plaintiffs to suffer a loss of pay, benefits, and prestige for which Plaintiffs are entitled to damages.

44. Defendant's actions have caused the Plaintiffs to suffer mental and emotional distress, entitling Plaintiffs to compensatory damages.

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DISTRICT CLERK OF
MCLENNAN COUNTY, TEXAS

VII.
RETALIATION BY DEFENDANT IN VIOLATION
OF THE TEXAS LABOR CODE

45. Plaintiffs re-allege and incorporate the allegations stated in the Paragraphs above as if fully set forth herein.

46. Plaintiffs engaged in a protected activity under the Texas Labor Code § 21.001, *et seq.*, while employed by Defendant by reporting and opposing discrimination based on race.

47. Defendant engaged in intentional retaliation against Plaintiffs for Plaintiffs' participation in protected activity.

48. Defendant's conduct violates the Texas Labor Code.

49. Defendant's unlawful retaliation in violation of the Texas Labor Code has caused Plaintiffs to suffer a loss of pay, benefits, and prestige for which Plaintiffs are entitled to damages.

50. Defendant's actions have caused Plaintiffs to suffer mental and emotional distress, entitling Plaintiffs to compensatory damages.

51. To redress the injuries Plaintiffs have sustained as a result of Defendant's unlawful retaliatory practices, Plaintiffs have retained the undersigned counsel to represent them and seek recovery of reasonable attorneys' fees, experts' fees, and costs.

VIII.
42 U.S.C. § 1981 DISCRIMINATION AND RETALIATION

52. Plaintiff incorporates all of the above paragraphs as if restated herein.

53. This cause of action is brought through 42 U.S.C. § 1983.

54. Plaintiffs were both denied equal rights and benefits under § 1981 because of their race and because of their protected activity.

55. Defendant denied Plaintiffs equal rights when, among other things, Defendant indefinitely banned Ms. Collins from campus and when it informed Dr. Collins that his contract would be non-renewed.

IX.
JURY DEMAND

56. Plaintiffs exercise their right to a trial by jury.

X.
DAMAGES

57. WHEREFORE, Plaintiffs respectfully request that the above-named Defendant be cited to appear in this matter and that, after jury trial by proof, they be awarded:

- i. Back pay, including but not limited to, lost wages, and other employment benefits;
- ii. Front pay, including but not limited to wages, and other employment benefits;
- iii. Judgment against Defendant for compensatory damages including emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life;
- iv. Actual damages;
- v. Punitive damages;
- vi. Injunctive relief, including an order prohibiting Defendant from engaging in discriminatory practices or retaliation on the basis of race;
- vii. Judgment against Defendant for Plaintiffs' reasonable attorneys' and experts' fees; and costs of suit;

- viii. Prejudgment and post-judgment interest as allowed by law; and
- ix. Such other and further legal and/or equitable relief to which Plaintiffs may be justly entitled, as this court may deem proper.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray that a citation be issued, and that upon a trial on the merits Plaintiffs be awarded the relief requested in this Petition and such other and further relief to which they may be justly entitled.

Respectfully submitted,
WILEY WALSH, P.C.

By: /s/ Colin Walsh
Colin Walsh
Texas Bar No. 24079538
*Board Certified Specialist, Texas Board of Legal
Specialization, Labor and Employment Law*
Jairo Castellanos
Texas Bar No. 24089624

WILEY WALSH, P.C.
1011 San Jacinto Blvd., Ste. 401
Austin, TX 78701
Telephone: (512) 271-5527
Facsimile: (512) 201-1263
colin@wileywalsh.com
ATTORNEYS FOR PLAINTIFF

The State of Texas
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County
Texas do hereby certify that the foregoing is a true and correct
copy of the original as the same appears on file in the District
Court, McLennan County, Texas witness my official hand and seal of
office this the 22nd day of June
A.D. 2021

Jon R. Gimble
McLennan County, Texas
By [Signature] Deputy

CERTIFIED DOCUMENT
PAGE 2 OF 2
DISTRICT CLERK OF
MCLENNAN COUNTY, TEXAS

[Print this page](#)**Case # 2021-1636-5 - DR. LAMAR COLLINS, ET AL VS. ROBINSON ISD (414TH)****Case Information**

Location	McLennan County - District Clerk
Date Filed	6/3/2021 2:50 PM
Case Number	2021-1636-5
Case Description	DR. LAMAR COLLINS, ET AL VS. ROBINSON ISD
Assigned to Judge	414TH
Attorney	Colin Walsh
Firm Name	Rob Wiley, P.C.
Filed By	Colin Walsh
Filer Type	Not Applicable
Damages Sought	Monetary relief over \$250,000 but not more than \$1,000,000

Fees

Convenience Fee	\$8.61
Total Court Case Fees	\$298.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$0.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Provider Service Fees	\$0.00
Total Provider Tax Fees	\$0.00
Total Taxes (for non-court fees)	\$0.00
Grand Total	\$306.61

Payment

Account Name	Visa Southwest Rapid Rewards (KNW)
Transaction Amount	\$306.61
Transaction Response	Approved
Transaction ID	79533233
Order #	054074420-0

Nichelle Robinson
 JOH R. GIMMICK
 DISTRICT CLERK
 MCLENNAN CO. TX.
 2021 JUN -3 PM 3:33
 FILED

Petition

Filing Type	EFile
Filing Code	Petition
Motion Code	
Filing Description	Original Petition

Envelope Details

Reference Number

Comments

Status

Accepted Date

Accept Comments

Fees

Court Fee

Service Fee

Documents

Lead Document

Please send the citation to colin@wileywalsh.com

Accepted

6/3/2021 3:45 PM

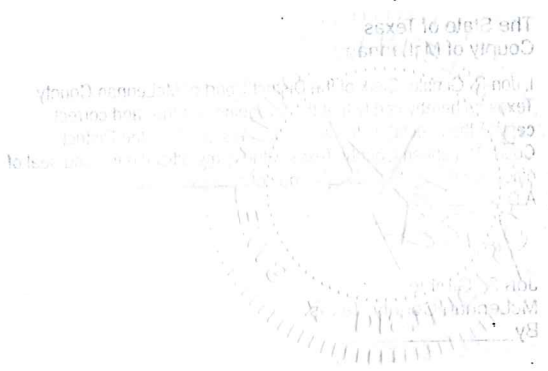
PLEASE NOTE: ISSUANE FEES WERE
REMOVED. PLEASE FILE A WRITTEN
REQUEST FOR ISSUANCE AND PAY THE \$8
CITATION FEE AND A \$9 COPY FEE.
THANK YOU

\$0.00

\$0.00

Plaintiff's Original Petition - Collins 6-3-21
FINAL.pdf

[Original] [Transmitted]



NOTED
PAGE 16 OF 23
DISTRICT CLERK OF
DALLAS COUNTY, TEXAS

[Print this page](#)**Case # 2021-1636-5 - DR. LAMAR COLLINS, ET AL VS. ROBINSON ISD (414TH)****Case Information**

Location	McLennan County - District Clerk
Date Filed	6/3/2021 4:25 PM
Case Number	2021-1636-5
Case Description	DR. LAMAR COLLINS, ET AL VS. ROBINSON ISD
Assigned to Judge	414TH
Attorney	Colin Walsh
Firm Name	Rob Wiley, P.C.
Filed By	Colin Walsh
Filer Type	Not Applicable

Fees

Convenience Fee	\$0.49
Total Court Case Fees	\$0.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$17.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Provider Service Fees	\$0.00
Total Provider Tax Fees	\$0.00
Total Taxes (for non-court fees)	\$0.00
Grand Total	\$17.49

Payment

Account Name	Visa Southwest Rapid Rewards (KNW)
Transaction Amount	\$17.49
Transaction Response	Approved
Transaction ID	79538983
Order #	054082806-0

Request

Filing Type	EFileAndServe
Filing Code	Request
Motion Code	
Filing Description	Request for Issuance of a Citation
Reference Number	

FILED

2021 JUN -3 PM 4:40

JOHN R. GIMBLE
DISTRICT CLERK
MCLENNAN CO.

Nichelle

Madison

Comments

Status Accepted
Accepted Date 6/3/2021 4:30 PM

Fees

Court Fee \$17.00
Service Fee \$0.00

Optional Services

Issue Citation \$8.00
Copies - Certified \$9.00 (9 x \$1.00)

Documents

Lead Document Request for Issuance filled out.pdf [Original] [Transmitted]

eService Details

Name/Email	Firm	Service Method	Status	Served	Date/Time Opened
Colin Walsh colin@wileywalsh.com		EServe	Sent	Yes	Not Opened
Christine S Badillo cbadillo@wabsa.com		EServe	Sent	Yes	Not Opened

NOT FOR COURT USE
DISTRICT CLERK OF
PAGE 2 OF 2
CERTIFIED DOCUMENT



CITATION

THE STATE OF TEXAS

Cause No: 2021-1636-5

COPY

**PAPER# 1
ATTY/MAIL**

**TO: ROBINSON INDEPENDENT SCHOOL DISTRICT, A LOCAL GOVERNMENT UNIT OR MUNICIPALITY,
DEFENDANT - BY SERVING ITS SUPERINTENDENT, DR. MICHAEL HOPE, AT 500 W LYNDAL, ROBINSON,
TEXAS 76706**

GREETINGS:

YOU ARE HEREBY COMMANDED to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

PARTIES TO THIS ACTION ARE:

DR. LAMAR COLLINS AND ROSE COLLINS

Plaintiffs

VS.

**ROBINSON INDEPENDENT SCHOOL DISTRICT,
A LOCAL GOVERNMENT UNIT OR MUNICIPALITY**

Defendant

**Court: 414TH JUDICIAL DISTRICT
Pleading: PLAINTIFF'S ORIGINAL PETITION
Pleading File Date: JUNE 3, 2021
Cause No: 2021-1636-5**

NOTICE

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.
Issue Date: JUNE 4, 2021.

**COLIN WALSH
1011 SAN JACINTO BLVD
SUITE 401
AUSTIN, TEXAS 78701
Attorney for Plaintiffs**

Jon R. Gimble, District Clerk
501 Washington Ave., Suite 300 Annex
Waco, McLennan County, Texas 76701

By: Nichelle Maddison, Deputy
NICHELLE MADDISON

**CERTIFIED DOCUMENT
PAGE 1 OF 2
DISTRICT CLERK OF
McLENNAN COUNTY, TEXAS**

PE

RETURN OF SERVICE

Style: **DR. LAMAR COLLINS AND ROSE COLLINS VS. ROBINSON INDEPENDENT SCHOOL DISTRICT, A LOCAL GOVERNMENT UNIT OR MUNICIPALITY**

Cause No: **2021-1636-5**

Court: **414TH JUDICIAL DISTRICT**

Paper#: **1**

Pleading: **PLAINTIFF'S ORIGINAL PETITION**

Came to hand on the _____ day of _____, 20____ at _____ o'clock ____ M. and executed on the _____ day of _____, 20____ by delivering to the party designated in the citation, to-wit:

at _____ o'clock ____ M; in person, a true copy of this citation with a true and correct copy of the pleading attached thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy _____

Total \$ _____ County, Texas

**NO SHERIFF OR CONSTABLE
FEES COLLECTED**

By _____

NOT EXECUTED FOR THE FOLLOWING REASONS _____

and having attempted on _____.

"My name is _____ (First) _____ (Middle) _____ (Last), my

date of birth is _____, and my address is _____.

I declare under penalty of perjury that the foregoing is true and correct. Executed in _____ County, State of Texas, on the _____ day of _____ (Month) _____ (Year)

_____. (Signature) Declarant"

**CERTIFIED DOCUMENT
PAGE 2 OF 2
DISTRICT CLERK OF
MCLENNAN COUNTY, TEXAS**

The State of Texas
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County Texas do hereby certify that the foregoing is a true and correct copy of the original as the same appears on file in the District Court, McLennan County, Texas witness my official hand and seal of office this the 22nd day of June A.D. 2021

Jon R. Gimble
Jon R. Gimble
McLennan County, Texas
By [Signature]
Deputy

FILED

MCLENNAN COUNTY
6/15/2021 2:03 PM
JON R. GIMBLE
DISTRICT CLERK

Rosa Perez



WALSH GALLEGOS
TREVIÑO KYLE & ROBINSON P.C.

REQUEST FOR CERTIFIED COPIES

June 15, 2021

McLennan County District Clerk
ATTN: Theresa Spire, Civil Division
501 Washington Avenue, Suite 300
Waco, Texas 76701

Via Electronic Case Filing

Re: Cause No. 2021-1636-5; *Dr. Lamar Collins and Rose Collins v. Robinson Independent School District*; In the 414th Judicial District Court, McLennan County, Texas

Dear Ms. Spire:

This office represents Defendant Robinson Independent School District in the above-referenced matter. I am writing to request certified copies of all documents in the court's file pertaining to the above-referenced case, including a certified copy of the docket sheet. It is our intent to remove the matter to federal court, and we need to provide a certified copy of this Court's entire file and docket sheet in that notice of removal. Pursuant to your instructions to my legal assistant this morning, this firm has paid concurrently with the filing of this request a total of \$18.00, which represents the charges associated with copying and certification of 18 pages. My assistant will email you a shipping label upon completion of filing this request as well.

Thank you for your assistance as we comply with the federal court's removal deadline.

Very truly yours,

/s/ Kelley L. Kalchthaler

Kelley L. Kalchthaler

KLK/aw

[Print this page](#)

Case # 2021-1636-5 - DR. LAMAR COLLINS, ET AL VS. ROBINSON ISD (414TH)

Case Information

Location	McLennan County - District Clerk
Date Filed	6/15/2021 2:03 PM
Case Number	2021-1636-5
Case Description	DR. LAMAR COLLINS, ET AL VS. ROBINSON ISD
Assigned to Judge	414TH
Attorney	Kelley Kalchthaler
Firm Name	Walsh Gallegos Trevino Kyle & Robinson P.C.
Filed By	Kelley Kalchthaler
Filer Type	Not Applicable

Fees

Convenience Fee	\$0.72
Total Court Case Fees	\$0.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$18.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Provider Service Fees	\$6.50
Total Provider Tax Fees	\$0.54
Total Taxes (for non-court fees)	\$0.00
Grand Total	\$25.76

Payment

Account Name	63-MyFileRunner Billing
Transaction Amount	\$25.76
Transaction Response	Approved
Transaction ID	80051612
Order #	054434216-0

Request

Filing Type	EFileAndServe
Filing Code	Request
Motion Code	
Filing Description	Request for certified copies
Reference Number	23950-098

2021 JUN 16 AM 8:01
 JON A. MCLENNAN
 DISTRICT CLERK
 McLennan County, TX

FILED

Envelope Details

Comments
 Status Accepted
 Accepted Date 6/15/2021 3:11 PM

Fees

Court Fee \$18.00
 Service Fee \$0.00

Optional Services

Copies - Certified \$18.00 (18 x \$1.00)

Documents

Lead Document Ltr to Clerk req cert record.pdf [Original] [Transmitted]

eService Details

Name/Email	Firm	Service Method	Status	Served	Date/Time Opened
Colin Walsh colin@wileywalsh.com		EServe	Sent	Yes	6/15/2021 2:19 PM
Christine S Badillo cbadillo@wabsa.com		EServe	Sent	Yes	Not Opened
Angi Williamson awilliamson@wabsa.com	Walsh Gallegos Trevino Russo & Kyle P.C.	EServe	Sent	Yes	Not Opened
Kelley Kalchthaler kkalchthaler@wabsa.com	Walsh, Anderson, Brown, Gallegos & Green, P.C.	EServe	Sent	Yes	Not Opened
David Holmes dholmes@wabsa.com	Walsh Gallegos Trevino Kyle & Robinson P.C.	EServe	Sent	Yes	Not Opened